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August 30, 2023

**VIA ECF**

United States District Court  
Southern District of New York  
Attn: Hon. Kenneth M. Karas, U.S.D.J.  
300 Quarropas Street, Courtroom 521  
White Plains, NY 10601-4150

**Re: Huerta, et al. v. J.D. Workforce, Inc., et al.**  
**Case No.: 7:23-cv-5382 (KMK) (AEK)**

Dear Judge Karas:

This office represents the Defendants J.D. Workforce, Inc., Hamwattie Bissoon, and Steven Deane (collectively hereinafter the “Defendants”) in the above-referenced case. See ECF Docket Entry 21. Defendants write, with the consent of the Plaintiffs, to respectfully an extension of time, until Monday, September 18, 2023, to respond to the complaint.

Pursuant to ¶ I(C) of this Court’s Individual Rules of Practice, Defendants respectfully submit that: (i) the original deadline to respond the complaint falls on July 20, 2023 or July 21, 2023 pursuant to the docket; (ii-iii) there have been no previous requests for an extension of this deadline; and (iv) opposing counsel consents to this request so long as Defendants waive all defenses related to the service of process, which Defendants agree to. The requested extension is necessary to investigate the allegations made in the complaint so as to form an appropriate response. As such, good cause exists for this Court to exercise its discretion in favor of granting the requested extension. Defendants thank this Court for its time and attention to this case.

Dated: Lake Success, New York  
August 30, 2023

Respectfully submitted,  
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